

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The Use of N11 Codes and Other)	
Abbreviated Dialing Arrangements)	CC Docket No. 92-105
)	
)	
)	

COMMENTS OF VERIZON¹

The Federal Communications Commission should expeditiously seek an amendment to the Pipeline Safety Improvement Act of 2002, 49 U.S.C. §§ 60101-60133 (Pipeline Safety Act), to require a ten-digit mnemonic toll-free telephone number, e.g., 888-DIG-SAFE, rather than select a three-digit nationwide, toll-free telephone number for use by state One Call notification systems.² The North American Numbering Council (NANC) is correct that “the quickest, least expensive and most effective way to provide nationwide, toll-free access to One-Call centers would be through a nationwide ten-digit mnemonic toll-free telephone number.”³ The NANC is also correct that the Commission should use 811 for One Call centers only as an interim solution.⁴ Finally, the Commission should squarely reject any proposal to use an abbreviated

¹ The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications, Inc., and are listed on Attachment A.

² The Pipeline Safety Act specifically requires the Department of Transportation, in consultation with the Commission, excavators, One Call notification centers, and others to establish “a 3-digit nationwide, toll-free telephone number system to be used by State one-call notification systems.” Pub. L. 107-355, § 17, 116 Stat. 3008 (Dec. 17, 2002).

³ Letter from Robert C. Atkinson, Chair, North American Numbering Counsel, to William F. Maher, Chief, Wireline Competition Bureau, CC Docket 92-105 (May 27, 2004) (original emphasis).

⁴ *Id.*

dialing arrangement, such as 344, for One Call centers, since such an arrangement will take several years to implement nationwide at substantial cost.

I. A Ten-Digit Mnemonic Telephone Number Is the Best Solution.

The Commission found in its *Abbreviated Dialing Order*⁵ that N11 codes are scarce resources.⁶ The Commission stated that “the burden should be on those who urge the . . . assign[ment of] available N11 codes to show that the benefits of such a requirement outweigh the costs,”⁷ adding that “there are other ways currently available to achieve convenient dialing that do not drain scarce N11 resources.”⁸ The Commission also concluded that N11 codes should be used for critical services that have “an element of urgency likely attaching to calls to police that is lacking when the public is seeking access to other governmental services.”⁹

The use of a three-digit N11 code for the purposes at issue here does not meet that standard. While it is important to obtain information about the location of buried utility facilities before an excavation, this information can be easily obtained through means that do not involve the use of a scarce N11 resource, and such information lacks the urgency of an immediate response that attaches to emergency services. Indeed, in most cases, the user of an N11 number (or an 800 number) for One Call notification would be required to dial additional numbers through a telephonic “menu” in order to specify construction area, alternative excavation routing,

⁵ *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, 12 FCC Rcd 5572 (1997).

⁶ *Abbreviated Dialing Order*, 12 FCC Rcd at 5604, ¶ 53.

⁷ *Id.* at 5584, ¶ 19.

⁸ *Id.* ¶ 20.

⁹ *Id.* at 5598, ¶ 44.

and other pertinent information. Dialing an N11 number only to be routed to an interactive voice response system quite obviously mitigates the need for an N11 number in the first instance.¹⁰

Finally, from a technical perspective, nationwide coverage through a ten-digit solution could be implemented more quickly and less expensively than a three-digit alternative because many existing numbers may not need to be changed if the Commission were to adopt a widely used ten-digit mnemonic toll-free number. For example, five states in the Verizon footprint (Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont) have successfully implemented a single ten-digit mnemonic toll-free number, i.e., 888-DIG-SAFE. The ten-digit option also facilitates a national single number customer education program because customers are familiar with dialing toll-free numbers to access a variety of services and understand that they will not be charged for the call.

For these reasons, Verizon concurs with the NANC that the Commission should expeditiously seek an amendment to the Pipeline Safety Act to provide for the establishment of a ten-digit mnemonic number.

If the Commission must use an NXX number as an interim measure until Congress can amend the Pipeline Safety Act, 811 is the only practical choice. Two other numbering options -- 411 and 611 -- are not formally allocated by the Commission, but they are widely used for directory assistance and telephone company repair service. And 111 is not available for technical reasons. All other N11 numbers have been assigned.

¹⁰ In addition, as the NANC noted, the National Emergency Number Association has expressed concern about potential mis-dialing of 811, resulting in inappropriate calls to 911, because of the proximity of the numbers 8 and 9 on the standard telephone dial pad. North American Numbering Council, Report and Recommendation of the Abbreviated Dialing for One Call Notification Issue Management Group at 9 (citing Attachment 2) (Oct. 29, 2003) (“NANC Report”) (cited in *In the Matter of The Use of N11 Codes and Other Abbreviated Dialing*

The Commission should recognize that a 6-12 month lead time will be necessary to make network changes and prepare for the appropriate routing of 811 calls to each One Call center.¹¹ Establishment of a single nationwide number should not affect existing state regulations promoting One Call centers except when a state's particular telephone number for access to the One Call notification system conflicts with the telephone number selected in this proceeding. For example, if the Commission adopts 800-DIG-SAFE or 811 as the number for nationwide access to One Call centers, states should not be able to promote any other One Call numbers. Of course, it is technically possible to route multiple 800 numbers or 811 to current state ten-digit numbers so that underlying systems need not be changed. It is simply the promotion of local numbers that should not be allowed to avoid causing confusion. Promotion of a single nationwide number should have no affect on existing state regulations and guidelines that otherwise apply to state One Call centers, however.

II. The Commission Should Not Adopt An Abbreviated Dialing Arrangement, such as 344, Since It Is Not Technically Achievable in a Reasonable Period of Time.

The Commission should reject any proposal to adopt an abbreviated dialing arrangement, such as an "Easily Recognizable Code" of 344.¹² This would not be in the public interest because assignment of an NPA for abbreviated dialing codes would further accelerate numbering exhaust. In addition, from a technical perspective, some existing switches would require either replacement or development work that would delay the capability of using 344 as a three-digit number. Vendor development for the affected switches would require new technical

Arrangements, CC Docket No. 92-105, Notice of Proposed Rulemaking at 3-4 n.13 (rel. May 14, 2004)).

¹¹ NANC Report at 11.

¹² An Easily Recognizable Code is a numbering plan area or area code designating special services, such as 888 for toll-free service. *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, 69 Fed. Reg. 31930, 31932 (2004) (to be codified at 47 C.F.R. pt. 54).

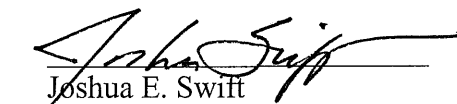
specifications, code preparation, and installation, testing, and release of a generic software release prior to distribution. This process could take one to three years for nationwide deployment by all vendors for each switch type. Some switches have limited vendor support for switch development or have been discontinued and would require switch replacement. Examples of these switches include the Nortel DMS-10, Lucent's 1AESS, 2BESS, and GTD-5, Mitel switches used primarily by rural carriers, the Ericsson AXE, the Siemens EWSD, and the Stromberg-Carlson/Pressly.¹³ In light of these technical and practical hurdles, the Commission should not adopt an Easily Recognizable Code solution of 344 or any other similar number.

Conclusion

For the foregoing reasons, the FCC should seek an amendment to the Pipeline Safety Act to allow for a nationwide ten-digit mnemonic toll-free telephone number and use 811 strictly on an interim basis. In light of the technical and cost concerns expressed by Verizon and the NANC, however, the Commission should reject use of an Easily Recognizable Code such as 344.

Respectfully submitted,

Of Counsel:
Michael E. Glover
Karen Zacharia


Joshua E. Swift
1515 North Court House Road
Suite 500
Arlington, VA 22201
tel (703) 351-3039
fax (703) 351-3662

Date: July 8, 2004

Attorney for Verizon

¹³ NANC Report at 9.

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.